



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

June 25, 2008

Bonneville Power Administration
Public Affairs Office –DKC-7
P.O. Box 14428
Portland OR 97293-4428

Re: CEQ # 20080216, Rebuild of the Libby (FEC) to Troy
115-kV Transmission Line FEIS

Dear BPA:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) for the Rebuild of the Libby (FEC) to Troy Section of BPA's Libby to Bonners Ferry 115-kilovolt Transmission Line, in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to our comments on the DEIS. While we have concerns regarding the extent of ground disturbances and potential water quality impacts associated with rebuilding the transmission line and the construction of many access roads, we support the BPA's preferred alternative to rebuild the Libby to Troy 115-kV transmission line along the existing transmission line corridor using the Kootenai River realignment option to avoid impacts to Kootenai Falls. The preferred alternative and alignment appears to involve less road construction and ground disturbance, and would result in less sediment delivery to 303(d) listed streams, Bobtail Creek and Quartz Creek, than the other action alternative and alignments. It is important that Bobtail Creek and Quartz Creek are not further degraded, and that rebuilding and maintenance of the transmission line will be consistent with Total Maximum Daily Loads intended to restore water quality and full support of beneficial uses to these impaired waters. The preferred alternative and alignment also appears to involve less impacts to vegetation, terrestrial habitat and wildlife, as well as less potential for spread of noxious weeds, than Alternative 1 and the other alignments.

We are pleased that BPA in conjunction with the Kootenai NF are planning additional road storage projects as mitigation to compensate for water quality, fisheries and wildlife impacts of transmission line construction, and that mitigation for unavoidable impacts to wetlands will be determined through coordination and consultation with the U.S. Army Corps of Engineers during the 404 permitting process.



We are transmitting a copy of an e-mail message we received on June 23, 2008 from Mr. Jerry R. Gould, who says he is a local landowner with concerns about proposed transmission line and access road impacts to the Kootenai Falls bighorn sheep herd. This landowner believes a modification in the transmission line alignment should be considered to reduce impacts to the bighorn sheep herd. We believe these concerns should be evaluated and addressed before a final transmission line alignment is identified in the Record of Decision.

We appreciate the opportunity to review and provide comments on the proposed project during the NEPA process. If you have any questions you may contact Mr. Steve Potts of my staff in Helena at (406) 447-5022 or in Missoula at (406) 329-3313, or via e-mail at potts.stephen@epa.gov . Thank you for your consideration.

Sincerely,

/s/ John F. Wardell,
Director
Montana Office

cc: Larry Svoboda/Julia Johnson, 8EPA-N, Denver